

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SAMUEL TIGGS

Plaintiff,

-against-

THE CITY OF NEW YORK, DEPARTMENT OF
CORRECTION COMMISSIONER MARTIN F.
HORN, PRISON HEALTH SERVICES, INC., MICHAEL
CATALANO, C.E.O. OF PRISON HEALTH SERVICES,
INC., DOHMH MEDICAL DIRECTOR TREVOR
PARKS, DOHMH PROGRAM DIRECTOR REBECCA
PINNEY, DOHMH DEPUTY COMMISSIONER JAMES
CAPOZIELLO, DOHMH MEDICAL DIRECTOR
DOCTOR BENJAMIN OKONTA, DR. FRANTZ
MEDARD, PRISON HEALTH SERVICES, INC.,
NURSES JOHN DOE 1-5, PRISON HEALTH
SERVICES, INC., DOCTORS JOHN DOE 1-5, PRISON
HEALTH SERVICES, INC., PHYSICIANS'
ASSISTANTS 1-5, PRISON HEALTH SERVICES, INC.,
PHARMACISTS JOHN DOE 1-5, DEPARTMENT OF
CORRECTION EMPLOYEES, JOHN DOE 1-5,

Defendants.

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DECLARATION OF CYNTHIA
CONTI-COOK IN
OPPOSITION TO
DEFENDANTS' MOTION TO
DISMISS PURSUANT TO
RULE 12(b)6

Docket #07-CV-7254

ECF CASE

CYNTHIA CONTI-COOK declares, under penalty of perjury, the following:


1. I am an associate of the law firm Stoll, Glickman & Bellina, LLP, counsel for plaintiff, Samuel Tiggs, in the above-captioned matter. As such, I am fully familiar with all of the proceedings had herein and submit this declaration in opposition to defendants' motion to dismiss.
2. Annexed hereto as Exhibits are documents which are relied upon and cited in plaintiff's Memorandum of Law accompanying this motion:

Exhibit A: Plaintiff's Complaint dated August 14, 2007

Exhibit B: Defendant's Memorandum of Law dated November 16, 2007

DATED: Brooklyn, New York
November 30, 2007

To:
John H. Bone, Esq.
Heidell, Pittoni, Murphy & Bach, LLP
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